

PIETRAGALLO  
PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP

A T T O R N E Y S   A T   L A W

38TH FLOOR ONE OXFORD CENTRE PITTSBURGH, PA 15219  
412.263.2000 FAX: 412.263.2001  
WWW.PIETRAGALLO.COM

DIRECT DIAL NO.: 412.263.1816  
DIRECT FAX NO: 412.263.4246  
FILE NO.: MYLAN-112578  
EMAIL: cct@pietragallos.com

July 24, 2020

**Via ECF**

The Honorable Joel Schneider  
United States Magistrate Judge  
USDC, DISTRICT OF NEW JERSEY  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

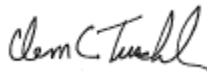
Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*  
USDC, District of New Jersey, No. 1:19-md-2875-RBK-JS

Dear Judge Schneider:

As confirmed on the record during the July 15, 2020 Case Management Conference, Mylan intends to use a continuous multi-modal learning ("CMML") platform to assist with the review and production of Mylan's electronically stored information ("ESI"). At this stage of its custodial ESI review, Mylan will not be limiting the pool of documents to be reviewed based on CMML. Nevertheless, to the extent that the CMML platform ultimately identifies a set of documents that are unlikely to be responsive, Mylan reserves its right to meet-and-confer with Plaintiffs in order to limit the manual review of such documents. Plaintiffs may at that time elect to have Mylan continue the review at Plaintiffs' sole expense.

Mylan recognizes that not all Defendants' data is the same. As a result, a one-size-fits-all approach to the use of analytics may not be feasible. Accordingly, Mylan is willing to work with Plaintiffs and the Court to craft an approach that is both reasonable and appropriate based upon Mylan's circumstances.

Respectfully submitted,



Clem C. Trischler

c: All Counsel of Record (via ECF service)